

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SHOSHANA HEBSHI,

Plaintiff,

Case No. 4:13-cv-10253-TGB-LJM
Hon. Terrence G. Berg

v

UNITED STATES OF AMERICA;
FRONTIER AIRLINES, INC.; JOHN BRAND,
in his individual capacity; UNKNOWN FBI
AGENT 1, in his individual capacity;
UNKNOWN FBI AGENT 2, in his individual
capacity; JOHN ETLING, in his individual
capacity; MARK DEBEAU, in his individual
capacity; JEREMY BOHN, in his individual
capacity; CAPTAIN PATRICK DRISCOLL, in
his individual capacity; OFFICER GRANT, in
his individual capacity; LT. M. WASIUKANIS,
in his individual capacity; TOYA PARKER, in
her individual capacity; DT. CARMONA, in his
or her individual capacity; OFFICER CARMONA,
in his or her individual capacity; OFFICER
JOHNSON, in his or her individual capacity;
CORPORAL BRADLEY, in his or her individual
capacity; UNKNOWN CBP OFFICER, in his
individual capacity; THOMAS PIPIS, in his
individual capacity; DAVID LAKATOS, in his
individual capacity; NATHANIEL DEVINS, in
his individual capacity; UNKNOWN TSA AGENT 1,
in his individual capacity; UNKNOWN TSA
AGENT 2; in her individual capacity; ROBERT BALL,
in his individual capacity; UNKNOWN ICE
OFFICER, in his individual capacity; and PAUL
BRUMLEY, in his individual capacity,

Defendants.

American Civil Liberties Union Fund of Michigan
By: Michael J. Steinberg (P-43085)
Sarah L. Mehta (P76024)
Attorneys for Plaintiff
2966 Woodward Avenue
Detroit, MI 48201
(313) 578-6814
msteinberg@aclumich.org
smehta@aclumich.org

American Civil Liberties Union
By: Rachel E. Goodman
Attorney for Plaintiff
125 Broad St., 18th Floor
New York, NY 10004
(212) 549-2633
rgoodman@aclu.org

Covington & Burling, LLP
By: Sarah E. Tremont (P73809)
Attorney for Plaintiff
1201 Pennsylvania Ave., NW
Washington, DC 20004-2401
(202) 662-6000
stremont@cov.com

Goodman & Hurwitz, P.C.
By: Julie H. Hurwitz (P34720)
Kathryn Bruner James (P71374)
Miriam R. Nemeth (P76789)
William H. Goodman (P14173)
Attorneys for Plaintiff
1394 E. Jefferson Ave.
Detroit, MI 48207
(313) 567-6170
jhurwitz@goodmanhurwitz.com
kjames@goodmanhurwitz.com
mnemeth@goodmanhurwitz.com
bgoodman@goodmanhurwitz.com

Cummings, McClorey, Davis & Acho, P.L.C.

By: T. Joseph Seward (P-35095)

Attorney for Defendants, Jeremy Bohn, Corporal Michael Bradley, Lieutenant Michael Wasiukanis and Captain Patrick Driscoll

33900 Schoolcraft Rd.

Livonia, MI 48150

(734) 261-2400

tjseward@cmda-law.com

Law Offices of Alan B. Havis, Esq.

By: Alan B. Havis (P36988)

Attorney for Defendants, Mark DeBeau, Officer Grant, Toya Parker, Detective Carmona, Officer Carmona and Officer Charles Johnson

25505 West 12 Mile Rd., Ste. 1000

Southfield, MI 48034

(248) 353-3690

ahavis@airportdefender.com

U.S. Attorney's Office

By: Lynn Marie Dodge (38136)

Attorney for Defendants, United States of America, John Brand,, John Etling, Thomas Pipis, David Lakatos, Nathaniel Devins, Robert Ball and Paul Brumley

211 W. Fort St., Ste. 2001

Detroit, MI 48226

(313) 226-9100

Lynn.dodge@usdoj.gov

U.S. Department of Justice

Torts Branch

By: Sarah E. Whitman

Attorney for Defendants, United States of America, John Brand, John Etling, Thomas Pipis, David Lakatos, Nathaniel Devins, Robert Ball and Paul Brumley

P.O. Box 7146

Ben Franklin Station

Washington, DC 20004

(202) 616-0089

Sarah.whitman@usdoj.gov

Alder, Murphy & McQuillen, LLP

By: Brian T. Maye (IL 6288778)

Paula L. Wegman (IL 6239491)

Steven L. Boldt (IL 6302430)

Attorneys for Defendant, Frontier Airlines, Inc.

20 S. Clark Street, Suite 2500

Chicago, IL 60603

(312) 345-0700

bmaye@amm-law.com
pwegman@amm-law.com
sboldt@amm-law.com

Foster, Swift, Collins & Smith, P.C.
By: Alexander A. Ayar (P69623)
Attorney for Defendant, Frontier Airlines, Inc.
32300 Northwestern Hwy., Suite 230
Farmington Hills, MI 48334
(248) 538-6326
AAyar@fosterswift.com

PROOF OF SERVICE

I, Angela M. Florence, hereby certify that I am employed by the law firm of CUMMINGS, McCLOREY, DAVIS & ACHO, P.L.C., attorneys for Defendants, JEREMY BOHN, CORPORAL MICHAEL BRADELY, LIEUTENANT MICHAEL WASIUKANIS AND CAPTAIN PATRICK DRISCOLL, ONLY, in the above-entitled cause of action, and that on May 15, 2013, I served correct copies of **DEFENDANTS, JEREMY BOHN, CORPORAL MICHAEL BRADELY, LIEUTENANT MICHAEL WASIUKANIS AND CAPTAIN PATRICK DRISCOLL, ONLY'S CROSS COMPLAINT AGAINST FRONTIER AIRLINES, INC.**, along with this Proof of Service upon:

Alder, Murphy & McQuillen, LLP
Brian T. Maye
Paula L. Wegman
Steven L. Boldt
20 S. Clark Street, Suite 2500
Chicago, IL 60603

Foster, Swift, Collins & Smith, P.C.
Alexander A. Ayar
32300 Northwestern Hwy., Suite 230
Farmington Hills, MI 48334

by placing said copies in an envelope, correctly and plainly addressed as shown above, and depositing said envelope in the United States Mail, with postage thereon fully prepaid.

/s/Angela M. Florence
Legal Assistant to T. Joseph Seward

Certificate of Service

I hereby certify that on **May 15, 2013**, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

SARAH MEHTA (P76024)
MICHAEL J. STEINBERG (P43085)
KARY L. MOSS (P49759)
ALAN B. HAVIS (P36988)
DENNIS D. PARKER
RACHEL E. GOODMAN
AYIRINI FONSCECA-SABUNE
LYNN M. DODGE (P38136)
WILLIAM H. GOODMAN (P14173)
JULIE HORWITZ (P34720)
KATHRYN BRUNER JAMES (P71374)
SARAH E. WHITMAN
ANNA ENGH
SHELLI CALLAND
ARJUN SETH
SARAH TREMONT (P73809)
BRIAN T. MAYE (IL 6288778)
PAULA L. WEGMAN (IL 6239491)
STEVEN L. BOLDT (IL 6302430)
ALEXANDER A. AYAR (P69623)

/s/T. Joseph Seward
Cummings, McClorey, Davis & Acho, P.L.C.
33900 Schoolcraft
Livonia, MI 48150
Phone: (734) 261-2400
Primary E-mail: tjseward@cmda-law.com
P-35095